

From: Theresa Noble Hill [THill@rhodesokla.com]
Sent: Thursday, May 17, 2007 2:04 PM
To: Trevor.Hammons@oag.ok.gov
Cc: George, Robert W.; michael.bond@kutakrock.com; Lori A. White; Mann, Dara D.; Sperrazza, Quynh C.; Candy J. Smith; John Tucker; jelrod@cwlaw.com; Vicki Bronson; Paul Thompson; jgraves@bassettlawfirm.com; Sanders; Griffin, Jennifer; Nicole Longwell; Philip Hixon; Scott McDaniel
Subject: RE: Agency Document Productions

Trevor,

- 1) Do you have dates for ODAFF, Tourism and Wildlife?
- 2) Have you confirmed whether you represent County Health Departments?
- 3) Have you confirmed whether you represent Oklahoma Geological Survey and Oklahoma Biological Survey?
- 4) With respect to local/regional offices:
 - a) From Rhonda Craig's deposition, we understand that there are responsive documents at the offices in Jay, Tahlequah and Roland. Please also confirm whether there is a local ODEQ office for Adair County. We will want to obtain documents from all local ODEQ offices in the IRW.
 - b) Please confirm whether documents from the Tulsa Field Office of OWRB were included in the original OWRB production. If not, we will want to obtain documents from the Tulsa Field Office.
 - c) We want to obtain documents from ODAFF's local offices that have information relating to IRW.
 - d) Please confirm whether you represent the Local Conservation Districts. It was our understanding from the Custodian depositions at Oklahoma Conservation Commission that these are separate and not state agencies. Please confirm.

Please provide the requested dates and confirm your representation of the above offices/agencies so that we can keep this process moving. We look forward to hearing from you in the very near future.

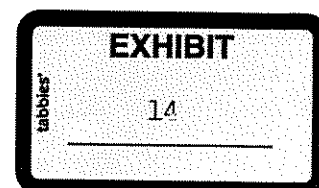
Theresa

-----Original Message-----

From: Theresa Noble Hill
Sent: Monday, May 07, 2007 3:04 PM
To: 'Trevor.Hammons@oag.ok.gov'
Cc: George, Robert W.; michael.bond@kutakrock.com; Lori A. White; Mann, Dara D.; 'Sperrazza, Quynh C.'; Candy J. Smith; John Tucker; jelrod@cwlaw.com; Vicki Bronson; Paul Thompson; jgraves@bassettlawfirm.com; Sanders; Griffin, Jennifer; Nicole Longwell; Philip Hixon; 'Scott McDaniel'
Subject: RE: Agency Document Productions

Trevor,

We would like to make ODAFF a top priority. However, if you have started the review of documents at Tourism and we can complete that review in the next two weeks, then by all means to keep things moving, we can go to Tourism next.



I am confused by your response with respect to your representation of other agencies. I have inserted my e-mail from Friday below. From the hearing on April 27, 2007, we understood that the only question as to representation involved County Health Departments. Are you advising that you will let me know as to the representation of County Health Departments and Oklahoma Geological Survey and Oklahoma Biological Survey this week? Please clarify immediately as we are moving forward with our preparations based on your representations to the Court on April 27, 2007 that counsel represents the entire Executive Branch.

Theresa

Friday's E-mail:

Trevor,

Please provide dates for the document productions for the following agencies:

- 1) Oklahoma Department of Agriculture, Food and Forestry;
- 2) Oklahoma Department of Tourism; and
- 3) Oklahoma Department of Wildlife Conservation.

We request that we move ODAFF to the top of the list in priority. We remain willing to discuss with you supplementation of records previously provided and additional records at ODAFF.

Some of the agencies where we have already reviewed documents indicated that there were also documents maintained at local offices. We expect that we will need to visit the local offices. We will advise which local offices that we would like to visit.

For purposes of future planning, there are additional agencies that we have identified that we will want to visit, including the Department of Health, Department of Mines, and Oklahoma Corporation Commission. We are preparing formal requests to these agencies with the understanding that you represent these agencies. However, we understand that you still are not clear on the representation of county health departments. We are prepared to move forward with requests to county health departments. Please confirm whether you represent these departments.

Please also confirm whether you represent the Oklahoma Geological Survey and Oklahoma Biological Survey.

We are anxious to keep the agency document production moving.

Thank you.

Theresa N. Hill
Rhodes Hieronymus

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immediately.

-----Original Message-----

From: Trevor.Hammons@oag.ok.gov [mailto:Trevor.Hammons@oag.ok.gov]
Sent: Monday, May 07, 2007 1:40 PM
To: Theresa Noble Hill
Subject: re: Agency Document Productions

Thresa,

I will get back to you on dates and I understand from your email that you wish to go back to ODAFF next. As for the other agencies, (who we represent) I will let you know this week.

J. Trevor Hammons
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